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REMARKS

Applicants respectfully request that the Examiner reconsider the subject application as amended herein.

Applicants have amended claims 1, 9 and 30 to more clearly point out and distinctly claim that which the Applicants consider as their invention. No new matter has been added.

INFORMATION DISCLOSURE STATEMENT

The Examiner has requested a copy of publications from the Information Disclosure Statement PTO 1449 (IDS). The Applicants submitted an IDS to the PTO with all cited references, evidenced by a return postcard enumerating the IDS and the cited references as being received by the PTO on April 23, 1999. The copy of the IDS returned to the Applicants with the subject Office Action shows each U.S. Patent Document initialed. However, the Other Prior Art is not initialed.

The "McCarty, Michael" reference, the "The Mbone Information Web@www.mbone.com" reference, the "Kashpureff.ORG Network Information Guide" reference, the "Internet Industry Group" reference, and the "Berniker, Mark" reference are resubmitted contemporaneously herewith.

35 U.S.C. § 102(e) REJECTION

The Examiner has rejected claims 1-6, 8, 9-17, 20-22, 30-36, and 38-40, under 35 U.S.C. §102(e) as being unpatentable over U.S. Patent 6,240,555 (hereinafter Shoff).

The Examiner has rejected claim 43 under 35 U.S.C. §102(e) as being unpatentable over U.S. Patent 6,091,411 (hereinafter Straub).

1 It is noted that both Shoff, Straub, and the subject application are assigned
2 to a common assignee.

3 **Claims 1-6**

4 Claim 1 is an independent claim and claims 2-6 depend from claim 1.

5 Applicants respectfully submit that claims 1-6 are patentable under §102(e)
6 at least because Shoff does not describe each of the following elements of
7 Applicants' claim 1:

- 8 (1) receiving an announcement on a monitored address containing
9 information specifying how and when to receive upcoming enhancing
10 content, the enhancing content being associated with the streaming content
11 and being at least one of broadcast and multicast; and
12 (2) receiving the enhancing content according to the information contained
13 in the announcement and at a time in synchronization with the streaming
14 content.

15 The Examiner has commented that Shoff discloses Applicants' element (1)
16 and (2) because the Shoff data structure 48 reads on Applicants' "announcement."
17 Applicants respectfully disagree

18 The "announcement" recited in Applicants' claim 1 is received on a
19 monitored address. The "announcement" specifies both how and when to receive
20 upcoming broadcast or multicast enhancing content. The enhancing content is
21 received according to the information contained in the "announcement" and at a
22 time in synchronization with the streaming content. Shoff does not describe any
23 of these elements.

24 Shoff describes an Electronic Program Guide (EPG) data structure 48 (Col.
25 4 line 35-42) for presenting video content with supplemental content. The EPG
includes both programming information (Col. 5 line 62) and a data field 58 for
target data that references resources containing supplemental content (Col. 6 line

1 7-9). In the EPG data structure, the target specifications in the data field 58 are
2 correlated with programs (Col. 5 line 63). If a program is interactive compatible, a
3 viewer unit retrieves the target specification from the EPG (Col. 9, line 20-22).
4 The viewer activates supplemental control (Col. 9, line 30-31). If a viewer decides
5 to enter the interactive mode, the target resource located by the target specification
6 in the data field 58 is activated (Col. 9 line 54-65).

7 Shoff describes a system that merely receives supplemental content at an
8 address pointed to in the data structure 48 associated with the scheduled time of a
9 program. Shoff does not describe a system that monitors an address, that has an
10 “announcement” describing how and when to receive broadcast or multicast
11 enhancing content, or that receives the enhancing content according to the
12 information in the announcement, and at a time synchronized with the streaming
13 content. Shoff describes a viewing unit that gets target information from a data
14 base rather than monitoring an address, retrieves the target specification rather
15 than monitoring an address for a broadcast or a multicast transmission according
16 to the “how” and “when” specified in the “announcement.” The data structure
17 described in Shoff does not contain how and when to receive the enhancing
18 content (because the data structure is not broadcast or multicast). The data
19 structure just describes where to retrieve the supplemental content associated with
20 specific programs.

21 The enhancing content is Applicants’ element (2) is synchronized by the
22 specification of “when” to monitor each enhancing content. The Examiner cites
23 Shoff (Col. 7 line 67 - Col. 8 line 3 with reference to Applicants’ depending claim
24 2) for the proposition that Shoff includes the time when the corresponding
25 enhancement content is to be sent information. Shoff describes that the digital

1 data includes timing information described as being implementable in “different
2 ways” such as by coordinating the supplemental content with a particular start
3 time and measuring time from the start, or characterizing the program in terms of
4 frames and keying the supplemental content to the frame numbers (Col. 10 line 7-
5 17). Shoff thus merely relies on ticks or a frame count from a reference, which is
6 not the same as Applicants’ recital of a time to monitor enhancements.

7 Because Shoff does not describe any of Applicants’ elements (1) and (2),
8 Applicants respectfully submit that Applicants’ claim 1 is patentable under
9 §102(e) over Shoff. Applicant’s dependent claims 2-6 being dependent upon and
10 further limiting independent claim 1, are allowable for that reason as well as for
11 the additional limitations they contain.

12 **Claim 8**

13 Applicants respectfully submit that Claim 8 is patentable under §102(e) at
14 least because Shoff does not describe, as described above with regard to
15 Applicants’ claim 1, either elements (1) or (2) as recited above with regard to
16 Applicants’ claim 1.

17 The Examiner comments that Shoff claim 16 (Col. 19 line 1 - Col. 20 line
18 13) discloses the above elements. Applicants respectfully disagree. Shoff merely
19 describes in claim 16 retrieving a target specification provided in association with
20 the video content (in data structure 48). The cited portion of Shoff includes none
21 of the above elements recited by Applicants and as described with reference to
22 Applicants’ claims 1-6. Shoff nowhere describes the Applicants’ recited
23 “announcement.”
24
25

1 Shoff does not describe in the cited reference any of the elements of
2 Applicants' claim 8. Applicants respectfully submit that Claim 8 is patentable
3 under §102(e) over Shoff.

4 **Claims 9-17**

5 Claim 9 is an independent claim and claims 10-17 depend from claim 9.

6 Applicants respectfully submit that Applicants' claims 9-17 are patentable
7 under §102(e) at least because Shoff does not describe each of the following
8 elements of Applicants' independent claim 9:

- 9 (1) forming announcements containing information specifying a first
10 address and a time at which to receive upcoming triggers;
11 (2) sending the announcements by broadcast or multicast to a second
12 address;
13 (3) monitoring the second address to receive the announcements;
14 (4) filtering the announcements to retain selected announcements;
15 (5) monitoring the first address at the time specified in the selected
16 announcements to receive triggers; and
17 (6) processing the triggers to coordinate presentation of the enhancing
18 content with the streaming content.

19 Applicants recite forming "announcements" that are broadcast or multicast
20 at a second address, that specify a first address to be monitored and a time when to
21 monitor the first address to receive "triggers," monitoring the second address to
22 receive the broadcast or multicast announcement, filtering the announcements,
23 monitoring the first address at the time specified to receive the triggers, and
24 processing the triggers to coordinate presentation of the enhancing content and the
25 streaming content.

As described with reference to claims 1-6 above, Shoff merely describes a
system having a data field 58 for target data that references resources containing
supplemental content, a viewer unit that retrieves a target specification from the

1 EPG, and activating the target specification in the data field 58. Applicants find
2 nowhere in Shoff any description of any of the elements recited by Applicants, i.e.
3 forming broadcast or multicast announcements at a second address specifying a
4 first address to be monitored and a time to monitor the first address to receive
5 “triggers,” monitoring the second address to receive the broadcast or multicast
6 announcement, filtering the announcements, monitoring the first address at the
7 time specified to receive the triggers, and processing the triggers to coordinate
8 presentation of the enhancing content and the streaming content. Shoff merely
9 describes a data structure 48 that includes a data field 58 holding a reference to a
10 location for the supplemental content arranged according to program time. Shoff
11 does not monitor the network but gets or activates all the data received.

12 Because Shoff does not describe any of the elements of Applicants’ claim
13 9, Applicants respectfully submit that Claim 9 is patentable under §102(e) over
14 Shoff. Applicant’s dependent claims 10-17 being dependent upon and further
15 limiting independent claim 9, are allowable for that reason as well as for the
16 additional limitations they contain.

17 **Claims 20-22**

18 Claim 20 is an independent claim and claims 21-22 depend from claim 20.

19 Applicants respectfully submit that Applicants’ claims 20-22 are patentable
20 under §102(e) for at least the reason that Shoff does not describe each of the
21 elements of Applicants’ independent claim 20.

22 Claim 20 includes the following elements:

23 (1) monitoring an announcement address to receive announcements
24 pertaining to enhancing content for enhancing the streaming content, (2) the
25 announcements containing information that specify a trigger address and times at
which to receive upcoming triggers;

1 (3) filtering the announcements to retain selected announcements;
2 (4) storing the selected announcements;
3 (5) monitoring the trigger address at the times specified in the selected
4 announcements to receive corresponding triggers; and
5 (6) processing the triggers to cause one of the following events to occur: 1)
6 receive one or more data files having the enhancing content, or 2) utilize the
7 enhancing content in the data files to enhance the streaming content.

8 The Applicants' recited "announcements" and "triggers" are not described
9 in any way in Shoff. Applicants recite as element (1) monitoring an address to
10 receive announcements. As described above with respect to claims 1-6, and 9-17,
11 Shoff merely describes a system having a data field 58 for target data that
12 references resources containing supplemental content, a viewer unit that retrieves
13 a target specification from the EPG, and activating the target specification in the
14 data field 58. Applicants recite in elements (2) and (5) that the announcements
15 contain the address and times to receive the triggers, and monitoring the address at
16 the times to receive the corresponding triggers. Again, because Shoff does not
17 describe announcements as described in element (1) and because Shoff does not
18 describe that announcements contain an address and time to receive triggers and
19 monitoring the address at the time to receive the triggers, the recited elements (2)
20 and (5) are not in any way described by Shoff. Therefore, and briefly, at least
21 because Shoff does not describe the announcements and triggers as recited by
22 Applicants, in elements (1), (2), and (5), Shoff does not describe the elements (3),
23 (4), and (6) of filtering the announcements, storing the selected announcements,
24 and processing the triggers to receive one or more data files having the enhancing
25 content, or utilize the enhancing content in the data files to enhance the streaming
content.

Shoff does not describe any of the elements (1)-(6) of Applicants' claim 20
above. Applicants respectfully submit that Claim 20 is patentable under §102(e)

1 over Shoff. Applicant's dependent claims 21-22 being dependent upon and further
2 limiting independent claim 20, are allowable for that reason as well as for the
3 additional limitations they contain.

4 **Claims 30-36**

5 Claim 30 is an independent claim and claims 31-36 depend from claim 30.

6 Applicants respectfully submit that Applicants' claims 30-36 are patentable
7 under §102(e) for at least the reason that Shoff does not describe each of the
8 elements of Applicants' independent claim 30.

9 Claim 30 includes the following elements:

10 (1) the content server being configured to form announcements that contain
11 information specifying an IP address and a time at which to receive upcoming
12 triggers, the content server sending the announcements to the client by
broadcasting or multicasting; and

13 (2) the client being configured to receive the announcements and monitor
14 the IP address at the time specified in the announcements to receive the triggers,
the client processing the triggers to coordinate presentation of the enhancing
content with the streaming content.

15 As described above with reference to Claims 1-6, 8, 9-17, and 20-22, Shoff
16 does not describe any of the elements (1) and (2) above. Shoff does not describe
17 monitoring an IP address to receive triggers that coordinate presentation of the
18 enhancing content with the streaming content, a content server forming the
19 announcements, a content server broadcasting or multicasting the announcements,
20 the client receiving the broadcast or multicast announcement, the client monitoring
21 the address at the specified time in the announcement to receive the trigger, and
22 the client processing the trigger to coordinate presentation of the enhancing
23 content with the streaming content. Shoff merely describes a data structure 48 that
24 includes a data field 58 holding a reference to a location for the supplemental
25

1 content arranged according to program time. Shoff does not monitor the network
2 but gets and activates all the data received.

3 Shoff does not describe any of the elements of Applicants' claim 30 above.
4 Applicants respectfully submit that Claim 30 is patentable under §102(e) over
5 Shoff. Applicant's dependent claims 31-36 being dependent upon and further
6 limiting independent claim 30, are allowable for that reason as well as for the
7 additional limitations they contain.

8 **Claims 38-40**

9 Claim 38 is an independent claim and claims 39-40 depend from claim 38.
10 Applicants respectfully submit that Applicants' claims 38-40 are patentable under
11 §102(e) for at least the reason that Shoff does not describe each of the elements of
12 Applicants' independent claim 38.

13 Claim 38 includes the following 3 elements:

- 14 (1) a listener to monitor an announcement IP address to receive
15 announcements pertaining to enhancing content for enhancing the video content,
16 the announcements containing information that specify a trigger IP address and
times at which to receive upcoming triggers;
17 (2) the listener further monitoring the trigger IP address at the times
specified by the announcements to receive corresponding triggers; and
18 (3) a rendering component to present the video content and to enhance the
video content with the enhancing content according to instructions received in the
19 triggers.

20 As described above with reference to Claims 1-6, 8, and 9-17,20-22, and
21 30-36, Shoff does not describe any of the elements (1)-(3) above. Shoff does not
22 describe in element (1) a listener to monitor an announcement IP address, the
23 listener to monitor in order to receive announcements pertaining to enhancing
24 content, the announcements containing information that specify a trigger IP
25 address and times at which to receive upcoming triggers. Shoff does not describe

1 in element (2) the listener monitoring the trigger IP address at times specified by
2 the announcements to receive corresponding triggers Shoff does not describe in
3 element (3) enhancing the video content according to the instruction received in
4 the trigger as defined in elements (1) and (2). Shoff merely describes a system
5 having a data field 58 for target data that references resources containing
6 supplemental content, a viewer unit that retrieves a target specification from the
7 EPG, and activating the target specification in the data field 58. Shoff does not
8 monitor the network but gets or activates all the data received. The IP address the
9 Office Action references in Fig. 3 is merely the address of the supplemental data
10 in the data structure 48, not the “trigger” IP address recited by Applicants.

11 Shoff does not describe any of the elements (1)-(3) of Applicants’ claim 38
12 above. Applicants respectfully submit that Claim 38 is patentable under §102(e)
13 over Shoff. Applicant’s dependent claims 39-40 being dependent upon and further
14 limiting independent claim 38, are allowable for that reason as well as for the
15 additional limitations they contain.

16 **Claim 43**

17 Applicants respectfully submit that claims 43 is patentable under §102(e)
18 for at least the reason that Straub does not describe each of the elements of claim
19 43.

20 Claim 43 includes the following elements:

- 21 (1) a first code segment for monitoring a broadcast or multicast IP address
22 to receive triggers, each trigger containing at least one item for a ticker; and
23 (2) a second code segment for rendering the ticker with the items received
via the triggers.

24 Straub does not describe a code segment for monitoring a broadcast or
25 multicast IP address to receive the recited triggers, each containing at least one

1 item for a ticker, or a second code segment for rendering the ticker with the items
2 received via the triggers. Instead, Straub describes getting a web collection file
3 WCF from an associated URL stored in a smart folder (Col. 8 lines 42-44). The
4 WCF contains a list of URLs which designate files that the Web Check update
5 service is to download. (Col. 9, lines 4-6). The cited section of Straub (Col. 14
6 lines 47-60) refer to the Straub describing getting information according to stored
7 hypertext pages that are not even necessarily transmitted from a network.
8 Nowhere in Straub is there a description of the client monitoring an address to
9 download ticker information. This is not inherent, and is novel in the subject
10 application. This is particularly not inherent because Straub nowhere describes
11 broadcasting or multicasting a message.

12 Straub does not describe any of the elements (1) and (2) of Applicants'
13 claim 43. Applicants respectfully submit that Claim 43 is patentable under
14 §102(e) over Straub.

15 **35 U.S.C. § 103(a) REJECTION**

16 The Examiner has rejected claims 7, 18, 23-24, 26-29, 37, and 41-42 under
17 35 U.S.C. §103(a) as being unpatentable over Shoff in view of Straub.

18 The Examiner has rejected claims 19 and 25 under 35 U.S.C. §103(a) as
19 being unpatentable over Shoff.

20 **Claim 7**

21 The Examiner has rejected claim 7 because Straub is said to disclose a
22 ticker. Applicants respectfully submit that claim 7 depends from claim 1, and
23 includes each of the elements of claim 1. As described above with reference to
24 claim 1, Shoff at least does not describe the elements (1) and (2) of claim 1.
25

1 Applicants additionally submit that there is no suggestion, motivation, or
2 teaching in Shoff to combine the teachings of Shoff with Straub. The Applicants
3 are unable to find any suggestion or teaching to combine the teaching of Straub
4 with Shoff. Applicants respectfully request that the Examiner provide such
5 teaching or suggestion. Shoff is directed at a television system that enables
6 presentation of supplemental content along with the television transmission.
7 Straub is directed at a computer operating system having a graphical interface that
8 can be updated from the internet and can contain a scrolling ticker that in no way
9 displays a supplemental information for a television transmission long with the
10 ticker. Thus, there is no motivation to combine the teachings of Shoff with Straub.

11 Applicant's claim 7 being dependent upon and further limiting independent
12 claim 1, is allowable for that reason as well as for the additional limitations it
13 contains.

14 **Claim 18**

15 Applicants respectfully submit that claim 18 depends from claim 9, and
16 includes each of the elements of claim 9. As described above with reference to
17 claim 9, Shoff at least does not describe the elements (1)-(6) of claim 9.

18 Moreover, as submitted above with respect to claim 7, there is no
19 suggestion, motivation, or teaching in Shoff to combine the teachings of Shoff
20 with Straub.

21 Applicant's claim 18 being dependent upon and further limiting
22 independent claim 9, is allowable for that reason as well as for the additional
23 limitations it contains.

24 **Claims 23-24**

25

1 Claims 23 and 24 each depend from claim 20, and includes each of the
2 elements of claim 20. As described above with reference to claim 20, Shoff at
3 least does not describe the elements (1)-(6) of claim 20.

4 Moreover, as submitted above with respect to claim 7, there is no
5 suggestion, motivation, or teaching in Shoff to combine the teachings of Shoff
6 with Straub.

7 Applicant's claims 23 and 24 being dependent upon and further limiting
8 independent claim 20, are allowable for that reason as well as for the additional
9 limitations they contains.

10 **Claims 26 and 27**

11 Claims 26 is an independent claim and claim 27 depends from claim 26.

12 Claim 26 recites the following elements:

- 13 (1) monitoring an IP (Internet Protocol) address to receive triggers, each
14 trigger containing at least one item for a ticker;
15 (2) forming an array of the items received in the triggers; and
16 (3) displaying the array within the ticker.

17 Neither Shoff nor Straub describes monitoring an IP address to receive
18 triggers, or each of these triggers containing at least one ticker, or forming an array
19 of the items received in the triggers, or displaying the array in the ticker.

20 Moreover, claim 27 recites receiving announcements at another IP address to
21 announce upcoming transmission of triggers that Applicants submit is not
22 described by Straub or Shoff. As described above with reference to claims 1-6, 8,
23 and 9-17,20-22, 30-36, and 38-40, Shoff merely describes a system having a data
24 field 58 for target data that references resources containing supplemental content,
25 a viewer unit that retrieves a target specification from the EPG, and activating the
target specification in the data field 58. Shoff does not monitor the network but

1 gets or activates all the data received. And as described above with reference to
2 claim 43, Straub describes getting a web collection file WCF from an associated
3 URL stored in a smart folder (Col. 8 lines 42-44). The WCF contains a list of
4 URLs which designate files that the Web Check update service is to download.
5 (Col. 9, lines 4-6). Applicants can find no description in Straub of forming an
6 array of the items received in the triggers.

7 The Examiner comments that it is inherent to monitor an IP address to
8 receive triggers. Applicants respectfully submit that it is not inherent to so,
9 particularly if the triggers are not broadcast or multicast. Shoff and Straub
10 disclose no multicasting or broadcasting of IP messages, particularly any IP
11 messages containing triggers.

12 Moreover, as submitted above with respect to claim 7, there is no
13 suggestion, motivation, or teaching, to combine the teachings of Shoff with
14 Straub.

15 Because neither Shoff nor Straub together or alone describe any of
16 Applicants' elements (1)-(2), and because there is no suggestion, motivation, or
17 teaching, to combine the teachings of Shoff with Straub, Applicants respectfully
18 submit that Applicants' claim 26 is patentable under §103(a) over Shoff in view of
19 Straub.

20 Applicant's dependent claims 27 being dependent upon and further limiting
21 independent claim 261, is allowable for that reason as well as for the additional
22 limitations it contains.

23 **Claim 28**

24 The Examiner comments that the elements being claimed embody the
25 method of claims 20 and 26 in a computer readable media.

1 Applicants respectfully submit as described above with reference to claim
2 20, Shoff does not describe the elements (1)-(6) of Applicants claim 20 and that
3 Claim 20 for at least that reason is patentable under §102(e) over Shoff.

4 Applicants respectfully submit that claim 28 does not embody the method
5 of claim 26. Nevertheless, as described above with reference to claim 26, neither
6 Shoff nor Straub together or alone describe any of Applicants' claim 26 elements
7 (1)-(2), and that claim 26 for at least that reason is patentable under §103(a) over
8 Shoff in view of Straub.

9 Moreover, as submitted above with respect to claim 7, there is no
10 suggestion, motivation, or teaching, to combine the teachings of Shoff with
11 Straub.

12 Because neither Shoff nor Straub together or alone describe any of the
13 elements of claim 18, and because there is no suggestion, motivation, or teaching,
14 to combine the teachings of Shoff with Straub, Applicants respectfully submit that
15 Applicants' claim 28 is patentable under §103(a) over Shoff in view of Straub.

16 **Claim 29**

17 The Examiner comments that the elements being claimed embody the
18 method of claim 26 in a computer readable media.

19 As described above with reference to claim 26, neither Shoff nor Straub
20 together or alone describes any of Applicants' claim 26 elements (1)-(2).

21 Moreover, as submitted above with respect to claim 7, there is no suggestion,
22 motivation, or teaching, to combine the teachings of Shoff with Straub.

23 Claim 26 for at least these reason is patentable under §103(a) over Shoff in view
24 of Straub.

25

1 **Claim 37**

2 The Examiner has commented that Straub discloses a ticker together with
3 streaming content.

4 Applicants respectfully submit that claim 37 depends from claim 30, and
5 includes each of the elements of claim 30. As described above with reference to
6 claim 30, Shoff at least does not describe the elements (1) and (2) of claim 30.

7 Moreover, Applicants respectfully submit that Straub nowhere describes
8 displaying streaming content with a ticker.

9 Moreover, there is no suggestion, motivation, or teaching in Shoff to
10 combine the teachings of Shoff with Straub as described above with reference to
11 claim 7.

12 Applicant's respectfully submit that claim 37 being dependent upon and
13 further limiting independent claim 30, is allowable for that reason as well as for
14 the additional limitations it contains.

15 **Claim 41**

16 Applicants respectfully submit that claim 41 depends from claim 38, and
17 includes each of the elements of claim 38. As described above with reference to
18 claim 38, Shoff does not describe the elements (1)-(3) of claim 38.

19 The Examiner has commented that Straub discloses a listener and video
20 control contained within an HTML page rendered by a rendering component.

21 Applicants respectfully submit that Straub nowhere describes s listener and video
22 control contained or not within an HTML page rendered by a rendering. The
23 Figures cited by the Examiner in Straub do not anywhere portray a video control
24 or a control for streaming content. Straub is concerned with displaying graphical
25

1 themes on a monitor controlled by an operating system (Abstract, Col. 3 lines 45-
2 49), not in any way displaying streaming content, video or not.

3 Moreover, there is no suggestion, motivation, or teaching in Shoff to
4 combine the teachings of Shoff with Straub as described above with reference to
5 claim 7.

6 Applicant's respectfully submit that claim 41 being dependent upon and
7 further limiting independent claim 38, is allowable for that reason as well as for
8 the additional limitations it contains.

9 **Claim 42**

10 Applicants respectfully submit that claim 41 depends from claims 38 and
11 41, and includes each of the elements of claims 38 and 41. As described above
12 with reference to claim 38, Shoff does not describe the elements (1)-(3) of claim
13 38. As described above with reference to claim 41, Shoff in view of Straub does
14 not describe the elements of claim 41.

15 Moreover, there is no suggestion, motivation, or teaching in Shoff to
16 combine the teachings of Shoff with Straub as described above with reference to
17 claim 7.

18 Applicant's respectfully submit that claim 42 being dependent upon and
19 further limiting independent claim 38, and dependent claim 4, is allowable for
20 both of these reasons as well as for the additional limitations it contains.

21 **Claims 19 and 25**

22 Claim 19 recites a computer-readable media having computer readable
23 instructions for performing steps of the method recited as claim 9. Applicants
24 have shown with regard to claim 9 that each of the elements recited in claim 9 is
25

1 not described in Shoff. Accordingly, Applicants respectfully submit that claim 19
2 is patentable under §103(a) over Shoff.

3 Claim 25 recites a computer-readable media having computer readable
4 instructions for performing steps of the method recited as claim 20. Applicants
5 have shown with regard to claim 20 that each of the elements recited in claim 20 is
6 not described in Shoff. Accordingly, Applicants respectfully submit that claim 25
7 is patentable under §103(a) over Shoff.

8
9 **CONCLUSION**

10 Applicants respectfully request reconsideration of the rejection of these
11 claims in view of the above remarks. Applicants respectfully suggests that for any
12 one of the preceding reasons, claims 1-43 are patentable and are in condition for
13 allowance.

14 Should any matter in this case remain unresolved, the undersigned attorney
15 respectfully requests a telephone conference with the Examiner to resolve any
16 such outstanding matter.

17
18
19 Respectfully Submitted,
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24 Date: October 2, 2002

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ATTACHMENT

1
2 In accordance with CFR § 1.121, a marked-up version of amended claim 1
3 showing all changes relative to the previous version of that claim is given below.

4 1. (Amended) A method for synchronizing streaming content with
5 enhancing content comprising the following steps:

6 receiving an announcement on a monitored address containing information
7 specifying how and when to receive upcoming enhancing content, the
8 announcement being sent at a time prior to sending the enhancing content and
9 being at least one of broadcast and multicast, the enhancing content being
10 associated with the streaming content;

11 receiving the streaming content;

12 receiving the enhancing content according to the information contained in
13 the announcement and at a time in synchronization with the streaming content; and
14 enhancing the streaming content with the enhancing content.

15
16 9. (Amended) A method for synchronizing streaming content with
17 enhancing content comprising the following steps:

18 forming announcements containing information specifying a first address
19 and a time at which to receive upcoming triggers;

20 sending the announcements by one of broadcast and multicast to a second
21 address;

22 monitoring the second address to receive the announcements;

23 filtering the announcements to retain selected announcements;

24 monitoring the first address at the time specified in the selected
25 announcements to receive the triggers; and

1 processing the triggers to coordinate presentation of the enhancing content
2 with the streaming content.
3

4 30. (Amended) A system for synchronizing streaming content and
5 enhancing content, comprising:

6 at least one content server;

7 a client;

8 the content server being configured to form announcements that contain
9 information specifying an IP address and a time at which to receive upcoming
10 triggers, the content server sending the announcements by at least one of
11 broadcasting and multicasting to the client; and

12 the client being configured to receive the announcements and monitor the
13 IP address at the time specified in the announcements to receive the triggers, the
14 client processing the triggers to coordinate presentation of the enhancing content
15 with the streaming content.
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